

UNITED STATES OF AMERICA

v.

Manning, Bradley E.  
PFC, U.S. Army,  
HHC, U.S. Army Garrison,  
Joint Base Myer-Henderson Hall  
Fort Myer, Virginia 22211

STIPULATION OF  
EXPECTED TESTIMONY

SA Antonio Edwards

DATED: 3 June 2013

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if Special Agent (SA) Antonio Edwards were present to testify during the merits and pre-sentencing phases of this court-martial, he would testify substantially as follows.

1. Since March of 2012, I have been employed as a Special Agent ("SA") of Homeland Security Investigations ("HSI"), Department of Homeland Security ("DHS") in the Atlanta Field Office, empowered by law to investigate and to make arrests for offenses involving the unlawful export of goods and technology to destinations outside the United States. Prior to working for HSI, from March 2008 to March 2012, I was employed as an SA with the United States Army Criminal Investigation Command ("USACIDC"), Computer Crime Investigative Unit ("CCIU") at Fort Belvoir, Virginia. In this capacity, I was responsible for the investigation of violations pertaining to computer intrusions and to other types of malicious computer activity directed against the U.S. Army (18 U.S.C. § 1030). As a USACIDC SA, I was also authorized to investigate crimes involving all violations of the Uniform Code of Military Justice and other applicable federal and state laws where there is a U.S. Army or Department of Defense (DoD) interest. I have participated in and conducted investigations of violations of United States laws and regulations pertaining to computer intrusions and I have participated in the execution of search warrants on individuals and companies.

2. Before working for USACIDC, from November 2007 to November 2008, I was employed as an SA with the Bureau of Industry and Security (BIS), Office of Export Enforcement. And, from May 2003 to October 2006, I was a Deputy Prosecutor for Morgan County, Indiana. From August 2000 to August 2005, I served in the Monroe County, Indiana Reserve Deputy Sheriff's Department as a Deputy Sheriff, where I received training in evidence collection. Further, I am a graduate of the Federal Law Enforcement Training Center's Criminal Investigator Training Program, where I also received training in evidence collection. In addition to being employed as a Special Agent, I currently serve in the Inactive Ready Reserves (IRR) as a Judge Advocate in the United States Army National Guard, District of Columbia.

3. In 2003, I received a Juris Doctorate from Indiana University and was subsequently admitted to the Indiana bar. I have a Bachelor of Arts in Psychology from the University of North Florida, and a Doctorate of Jurisprudence from Indiana University – Bloomington School of Law. I am currently licensed to practice law in Indiana.

4. My experience as a State Law Enforcement Officer, a State Prosecutor, and a Special Agent has included the investigation of cases involving violent and non-violent crimes as well as the use of computers. I have also received training and gained experience in: interviewing and interrogation techniques, arrest procedure, crime scene examination, evidence collection, search warrant applications, the execution of searches and seizures, and other criminal laws and procedures. Further, I have completed the Department of Defense Cyber Investigations Training Academy courses: "Introduction to Computer Hardware", "Computer Incident Responders Course", and "Windows Forensic Examinations – EnCase".

PROSECUTION EXHIBIT 26 for identification  
PAGE OFFERED:      PAGE ADMITTED:       
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Together, this afforded me certification as a Department of Defense "Certified Digital Media Collector" and "Certified Digital Forensic Examiner".


5. I follow several general procedures when handling evidence. I review the custody document and always ensure the description of the evidence matches the evidence attached. I check, for example, that recorded serial numbers, markings for identification, and condition description match the associated evidence. I ensure that the proper information, such as date and time, are properly and accurately recorded. Lastly, I maintain secure custody of the evidence prior to transferring it to another individual.


6. In this particular investigation, I assisted with witness interviews and the handling of evidence. In so doing, I worked with SA Charles Clapper and Mr. Garon Young. On 12 June 2010, I received several pieces of electronic evidence related to this investigation from the hands of Mr. Adrian Lamo and with his consent. On 12 June 2010, Mr. Adrian Lamo also gave signed consent to law enforcement personnel on two separate CID Forms 87-R-E to search his electronic devices for "[a]ll information in any form, pertaining to communications which may be in the form: of emails, instant messaging chats, documents, data, computer code, log files, drawings, photographs, or any other data; in encrypted, plain text, or any other format; relating to PFC Bradley E. MANNING and/or the disclosure of classified information or information which is the property of the U.S. Government." The first piece of evidence collected and further handled was a Lenovo Laptop computer with a Fujitsu computer hard drive (serial number: K404T812MF4D) recorded as Item 1 on a DA Form 4137 marked as document number (DN) 76-10, and known as "Lamo Ubuntu Hard Drive". It was collected from Mr. Adrian Lamo in Sacramento, California on 12 June 2010. The second piece of evidence collected and further handled was an HP Mini Brand computer (computer serial number: CNU90513VT) with a Seagate computer hard drive (hard drive serial number: 5RE2C1QK) recorded as Item 1 on a DA Form 4137 marked as document number (DN) 77-10, and known as "Lamo HP Hard Drive". It was collected from Mr. Adrian Lamo in Carmichael, California on 12 June 2010.

7. Using the DA Form 4137, I properly released these pieces of evidence to SA Clapper. On 14 June 2010, I properly regained possession from SA Clapper before properly releasing them to the Evidence Custodian, Mr. Garon Young, on 15 June 2010, which is documented on a DA Form 4137. While in possession of these items, I maintained control over them, stored them properly, and allowed no one else access to them. I did not alter the evidence in any way. I have no reason to believe this evidence was damaged or contaminated in any way. After releasing the evidence to Mr. Young, I had no further interaction with the evidence.

8. Prosecution Exhibit 13 for Identification is the Lamo Ubuntu Hard Drive (Item 1 of DN 76-10). Prosecution Exhibit 14 for Identification is the Lamo HP Hard Drive (Item 1 of DN 77-10).

  
ASHDEN FEIN  
MAJ, JA  
Trial Counsel

  
THOMAS F. HURLEY  
MAJ, JA  
Defense Counsel

  
BRADLEY E. MANNING  
PFC, USA  
Accused